

HARRIS
ST. LAURENT

June 14, 2020

VIA ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Your Honor:

I am one of the lawyers representing defendant Marc Lawrence in this case. I write to respectfully request that the Court approve Mr. Lawrence's travel to Brutus, Michigan on June 24th so he may visit his brother who was recently diagnosed with cancer. He also requests approval to travel from Brutus, Michigan to Eugene, Oregon on June 30th to visit his girlfriend's daughter, returning to Clearwater, Florida on July 9th.

As part of the conditions of release that the Court set for Mr. Lawrence on June 26, 2019, his travel was restricted to the State of Florida and the Southern and Eastern Districts of New York. (Docket No. 8). Mr. Lawrence seeks to travel from Clearwater, Florida to Brutus, Michigan by car from June 24th to June 25th. He would then stay with his brother from June 25th through June 30th. On June 30th, Mr. Lawrence seeks to travel by plane, departing from Detroit, Michigan and arriving in Portland, Oregon that evening. He would then rent a car to drive to Eugene. On July 7th, Mr. Lawrence seeks to travel by plane from Portland, Oregon and depart back to Detroit, Michigan. From July 8th to July 9th, Mr. Lawrence seeks to drive by car from Detroit, Michigan back to Clearwater, Florida.

Neither the government (AUSAs Jilan Kamal and Sagar Ravi) nor Pretrial Services (USPSO Anthony Zarate) objects to this request.

Sincerely,

/s/ _____
Michelle Fox

cc: AUSA Jilan Kamal, Esq. (by ECF)
AUSA Sagar Ravi, Esq. (by ECF)